

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In RE: Leonard S. Bergman Michele J. Bergman Debtors	Case No.:20-12276-AMC Chapter 13
Kenneth West, Esq. Chapter 13 Trustee Movant	Hearing Date:01/114/2025 Hearing Time: 09:30 A.M.

DEBTOR'S RESPONSE TO TRUSTEE'S MOTION TO DISMISS

To the Honorable Judge of the United States Bankruptcy Court for the Eastern of Pennsylvania:

The Debtor in this matter, Leonard S. Bergman and Michele J. Bergman, by counsel, responds to the Trustee's Motion to Dismiss as follows:

1. Trustee's Motion is admitted in part and denied in part. It is admitted said payments have not been in strict compliance with 11 U.S.C. § 1326.
2. Debtor resumed payments and will continue to make them. Debtor will submit a payment of \$850.00 to the Trustee on November 27, 2024. Debtor will then will pay \$400 on December 15, 2024. Debtor will pay \$450 on December 25, 2024. Debtor will pay \$238 on January 4, 2025. And Debtor will pay \$450 on January 15, 2025 and will resume regular plan payments.
3. Debtor's household experienced unanticipated expenses. Debtor believes that unanticipated expenses are under control and will resume timely payments to the Chapter 13 plan.

WHEREFORE, Debtor prays that the Trustee's motion be dismissed.

Date: 11/18/2024

/s/ Robert N. Kim

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